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June 30, 1998

CALFED BAY-DELTA PROGRAM
1416 Ninth Street, Ste. 1115
Sacramento CA 95814

Via Facsimile (916) 654-9780

RE: CALFED BAY-DELTA PROGRAMATIC DRAFT ENVIRONMENTAL IMPACT
REPORT

Dear Sirs:

My name is William Reynolds, my address is 4444 Undine Road, Stockton, CA 95206, I wish to enter the following comments concerning the draft EIR/EIS into the public record.

1. I am concerned that the Programmatic Draft EIS/EIR report does not fully evaluate the economic effect on San Joaquin County that would be caused if 100,000 or more productive agricultural acres are converted in some fashion to wildlife habitat. An editorial in this morning's Stockton Record identifies agriculture as the engine that drives the San Joaquin County economy; it further states that San Joaquin County is one of the top 10 ag-production counties in the nation.

The Draft EIR on page 8.1-14 says that a 3.2X multiplier was used to measure the economic impact of retiring significant agricultural acreage. Using this multiplier agriculture added \$4.76 billion to the county economy based on the \$1,487,476,000 in farm products produced in 1997 per the County Agricultural Commissioner's 1997 Annual Crop Report.

The County Agricultural Commissioner's Office feels that the 3.2X multiplier used in the Draft EIR is low. The Ag Commissioner's Office uses a 5.2X multiplier that they obtain from the University of California Agricultural Extension Service. This change results in over \$2.97 billion dollars of income rippling through the county that was not considered in the Draft EIR which states that there will be no negative economic consequences from converting 100,000 or more acres from agricultural production to habitat.

CALFED BAY-DELTA PROGRAM

June 30, 1998

Page 2

Further the Draft EIR is misleading on page 8.1-17 where Table 8.1.2-3 shows that San Joaquin County has been split 46% to the Delta Region and 54% into the San Joaquin Region for economic analysis. By combining 54% of San Joaquin County with areas as far south as Fresno it is easy to show a nil economic effect from retiring land from Ag production.

The San Joaquin County Agricultural Commissioner's 1997 Annual Crop Report shows that the county has 555,819 acres of total cropland, retiring 100,000 acres is 18% of that total. This translates to a possible reduction in the total value of the county crops of \$267 million which further converts to a minimum \$856 million reduction to the county economy using a 3.2X multiplier. This is not insignificant, and the loss to the county's cities and towns cannot be mitigated.

Further statistics contained in the 1997 Agricultural Report for San Joaquin County indicate that idling 100,000 acres from the present agricultural use would have an unmitigatable effect on about 200 delta farming operations and would reduce the agricultural work force by more than 2800 persons.

The economic effects of retiring 100,000 of more acres from Ag production in San Joaquin County violate your "Solution Principles" as it is not Equitable and will cause a Significant Redirected Impact on the region.

2. Each alternative identified in the Programmatic EIS/EIR calls for a lot of land to be retired from agricultural use and placed into habitat restoration projects.

Does the CALFED BAY-DELTA PROGRAM realize that San Joaquin County has been working for the past four years on plans to acquire as much as 100,000 acres or conservation easements as wildlife mitigation for county building activities? These are to be paid utilizing builder fees collected during the permit process. Additional acres in the county will be retired protecting upland game birds.

The CALFED alternative concerning habitat restoration projects must be coordinated and overlap San Joaquin County wildlife mitigation efforts to avoid further erosion of our agricultural economic base.

3. In the Ecosystem Restoration Program Plan Vol. II on page 29 it states:

"A major focus of the vision in the South Delta will be expansion of the floodway in the lower San Joaquin River between Mossdale and Stockton - set back levees and overflow basins offer opportunities to increase the flood bearing capacity of the river flood plain, as well as potential for creating significant amounts of native tidal emergent wetlands within the flood plain, regardless of which conveyance alternative is chosen."

CALFED BAY-DELTA PROGRAM

June 30, 1998

Page 3

This provokes the following questions:

- a. Do the plans for these setback levees and flood plain expansions include parcels on the east side of the San Joaquin River between Mossdale and Stockton? Specifically in areas belonging to Lathrop, French Camp or Stockton (Weston Ranch)? If not, you have violated at least two of your Solution Principals.
 - b. Do the plans for these setback levees and flood plain expansions include parcels from Stewart Tract that has been approved for development into a major housing development and theme park? If they are not included in your plans at least two of your Solution Principals have been violated.
 - c. Is the CALFED BAY-DELTA group aware that the City of Stockton is studying alternatives to improve its sewer plant? One of the alternatives now being discussed at the City Council level includes some sort of barrier at the mouth of Old River to raise the level of water flowing through the San Joaquin River.
4. I object to your characterization of growers in the "Water Use Efficiency Component on page 4-6 as:
- a. Reluctant to spend money on water conservation unless it can be returned in a short period of time". Growers REGULARLY spend money on irrigation items such as ditch repairs and Reclamation District improvements; the amounts spent on these can be a heavy burden. Additionally, many ranches have cement ditches that are certainly long-term investments and growers are using drip irrigation systems on most new permanent plantings.
 - b. For growers to use "untrained labor" for irrigation would be extremely unwise. The correct application of water to a growing crop is crucial to both the quality and quantity of the crop that is ultimately harvested. Incorrect cultural practices are punished in the marketplace.
 - c. The generational stereotype regarding the "passing of knowledge" between farm families is offensive. If generations disagree on business decisions, they do so throughout all of society. These differences are not restricted to agricultural irrigation efficiencies.

I look forward to receiving your public response to these comments.


William H. Reynolds